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6 Attorney for RENEE HERMANN

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 THE UNITED STATES OF AMERICA,) No. 2:24-cr-00304-JAM
11 Plaintiff,)
12 v.) **FOURTH STIPULATION AND ORDER**
13 FRANCISCO CORNEJO-QUEZADA,) **TO CONTINUE STATUS CONFERENCE**
14 SHAWN ERIC MORALES, SR., and) **AND EXCLUDE TIME**
15 RENEE MICHELLE HERMANN,)
16 Defendants.) Requested date: 10-21-2025
17) Time: **9:00 a.m.**
18) Judge: Hon. John A. Mendez
19 =====)
20

21 It is hereby stipulated between the parties, Robert Abendroth, Assistant United States
22 Attorney, John Manning, attorney for defendant FRANCISCO CORNEJO-QUEZADA, Mark
23 Reichel, attorney for defendant SHAWN ERIC MORALES, SR, and Michael D. Long, attorney for
24 defendant RENEE HERMANN, that the status hearing set for July 15, 2025, at 9:00 a.m., before
25 Judge Mendez, should be continued and re-set for October 21, 2025, at 9:00 a.m., before Judge
Mendez.

26 Each party has agreed to move the status hearing, with the Court's permission, to October 21,
27 2025. All parties are available to appear, and they all agree to appear, in court in-person on October
28 21, 2025, unless the defendant has a valid waiver of appearance on file.

29 The parties further agree that this court should make a finding of good cause for the requested
30 extension and that in fact good cause is hereby shown. The government has provided over 500 pages
31 of discovery along with dozens of audio and video recordings. All attorneys continue to read and
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view the discovery, investigate the case and meet with their respective clients. Counsel for defendants believe that failure to grant the above-requested continuance would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

Each party further stipulates that the ends of justice served by granting such continuance outweigh the best interests of the public and of all the defendants in a speedy trial. Time has already been excluded through July 15, 2025.

The request for extending the date for the status conference is at the specific request of each of the defendants and with the knowing, intelligent and voluntary waiver of each defendant's speedy trial rights under the law. The government agrees that a continuance is necessary. Good cause is hereby shown.

For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period from today's date to October 21, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

Dated: July 8, 2025

Respectfully submitted,

/s/ Michael D. Long

MICHAEL D. LONG
Attorney for Renee Hermann

/s/ John Munning

JOHN MANNING
Attorney for Francisco Cornejo-Quezada

/s/ Mark Reichel
MARK REICHEL
Attorney for Shawn Morales, Sr.

Dated: July 8, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ Robert Abendroth
ROBERT ABENDROTH
Assistant U.S. Attorney

ORDER

GOOD CAUSE APPEARING AND HAVING BEEN SHOWN, IT IS SO ORDERED.

The date for the **status conference** in this matter is hereby **RESET** for **October 21, 2025**,
at 9:00 a.m., before District Court Judge John A. Mendez.

Time is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial. Time is excluded through the new hearing date of October 21, 2025.

Dated: July 08, 2025

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE